

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	{	CHAPTER 13
	{	
Lateice Renee Bumpers,	{	CASE NO. 14-50682-WLH
	{	
DEBTOR.	{	

NOTICE OF HEARING

PLEASE TAKE NOTICE that Debtor has filed a “Motion to Extend the Automatic Stay,” and related papers with the Court seeking an order continuing the Automatic Stay of 11 U.S.C. Section 362(a) beyond the thirty day limit set forth in 11 U.S.C. Section 362(c)(3)(A) as to all applicable entities until such time as the Court grants relief from the stay for cause, or the stay is terminated pursuant to 11 U.S.C. Section 362(c)(1) or (2).

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion to Extend Automatic Stay in Courtroom **1403**, United States Courthouse 75 Spring Street, S.W., Atlanta, GA at **10:00 AM** on **January 29, 2014**.

Your rights may be affected by the court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Spring Street, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: January 16, 2014

/s/
Jonathan Proctor
GA Bar No. 890603
Robert J. Semrad & Associates
Suite 3600
101 Marietta St.
Atlanta, GA 30303

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MOTION TO EXTEND AUTOMATIC STAY

COMES NOW Debtor, Lateice Renee Bumpers, and asks this Court to extend the automatic stay of 11 U.S.C. Section 362(a) in this Chapter 13 Bankruptcy Case beyond the period of thirty (30) days against all Creditors and shows the Court the following:

1.

On January 8, 2014, Debtor filed a Voluntary Petition for Bankruptcy relief under Title 11, Chapter 13 of the United States Code.

2.

Debtor has filed one previous Chapter 13 bankruptcy case, bringing it within 11 U.S.C. Section 362(c)(3). Debtor's previous case, Case No. 13-61161, was filed on May 21, 2013. In the previous case, Debtor's confirmation was denied for failure to fund plan. This resulted in the dismissal of Debtor's previous Chapter 13 case.

3.

Debtor filed the instant case in good faith in an effort to save her house and vehicles from foreclosure and repossession. The house is necessary to provide the Debtor with adequate shelter. The vehicles are necessary to provide Debtor with transportation. Extension of the automatic stay will prevent Debtor from losing her house and vehicle.

4.

There has been a change in circumstances since the previous case was dismissed. During the last case, the Debtor lost her job, and she was unable to make her plan payments. Debtor has a new job and she is able to make her plan payments. Debtor's schedules reflect the ability to support the Chapter 13 payments.

5.

Extension of the automatic stay will not harm the creditors. In the instant case, Debtor has proposed to pay \$1200.00 per month through the Chapter 13 Plan, and pay a pro rata share of \$5,000.00 to unsecured creditors.

6.

Debtor has filed the instant case in good faith. Debtor asks the Court to find that the presumption that the instant case was not filed in good faith has been rebutted by clear and convincing evidence, as outlined above, and extend the automatic stay. Debtor asks the Court to allow her the opportunity to be successful in her current Chapter 13 case in order to retain her house and vehicles.

WHEREFORE, Debtor prays that this motion be Granted and that the automatic stay of 11 U.S.C. Section 362(a) be extended beyond thirty (30) days against all creditors.

Dated: January 16, 2014

/s/
Jonathan Proctor
GA Bar No. 890603
Robert J. Semrad & Associates
Suite 3600
101 Marietta St.
Atlanta, GA 30303

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CERTIFICATE OF SERVICE

I, Jonathan Proctor , attorney for Debtor, certify that the below listed parties and the attached service list have been served with a true and correct copy of the attached pleadings by placing a copy of same in a properly addressed envelope with adequate postage thereon and deposited in the United States Mail.

Nancy J. Whaley
Chapter 13 Trustee
303 Peachtree Center Ave
Suite 120
Atlanta, GA 30303

Lateice Renee Bumpers
1823 Springhill Cove
Lithonia, GA 30058

(See attached for additional mailing list)

Dated: January 16, 2014

/s/
Jonathan Proctor
GA Bar No. 890603
Robert J. Semrad & Associates
Suite 3600
101 Marietta St.
Atlanta, GA 30303

Label Matrix for local noticing
113E-1
Case 14-50682-wlh
Northern District of Georgia
Atlanta
Thu Jan 16 11:34:18 EST 2014

Aaron's Sales and Lease
5370 Stone Mountain Hwy
Ste 100
Stone Mountain, GA 30087-3577

Aini, Inc
Po Box 3097
Bloomington, IL 61702-3097

(p)AMERICREDIT
PO BOX 183853
ARLINGTON TX 76096-3853

Craig Z. Black
Robert J. Semrad & Associates, LLC
Suite 3600
101 Marietta Street
Atlanta, GA 30303-2716

Lateice Renee Bumpers
1823 Springhill Cove
Lithonia, GA 30058-7013

Condor Capital Copr
165 Oser Ave
c/o Patricia Yasparro
Hauppauge, NY 11788-3710

Credit Acceptance
c/o Brian Glasscock
PO Box 192585
Dallas, TX 75219-8523

Dekalb Medical
PO Box 116235
Atlanta, GA 30368-6235

Department of Justice, Tax Div
Civil Trial Section, Southern
PO Box 14198; Ben Franklin Sta
Washington, DC 20044-4198

First Premier Bank
601 S Minnesota Ave
Sioux Falls, SD 57104-4868

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

Holloway Credit Solutions
1286 Carmichael Way
Montgomery, AL 36106-3645

I.C. System Inc.
P.O. Box 64378
St Paul, MN 55164-0378

Internal Revenue Service
401 W Peachtree St. NW
Stop 334-D
Atlanta, GA 30308

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Jason Goodwin
1823 Springhill Cove
Lithonia, GA 30058-7013

Kross, Lieberman & St
1110 Navaho Dr.
Raleigh, NC 27609-7352

(p)MARLIN MEDCLR INOVISION
507 PRUDENTIAL ROAD
HORSHAM PA 19044-2308

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40 Capitol Square, SW
Atlanta, GA 30334-9057

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Santander Consumer Usa
Po Box 961245
c/o Annette King
Ft Worth, TX 76161-0244

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2872 Woodcock Blvd, Duke Bldg.
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Atlanta, GA 30341-4015

Special Assistant U.S. Attorne
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STOP 1000-D, Suite 600
Atlanta, GA 30308

U S Dept Of Ed/Gsl/Atl
Po Box 4222
c/o Ronee Moshier
Iowa City, IA 52244

United States Attorney's Offic
75 Spring Street, S.W.
Suite 600 U.S. Courthouse
Atlanta, GA 30303-3315

Wells Fargo Hm Mortgag
8480 Stagecoach Cir
c/o Delaycee Rowland,
Fort Mill, SC 29715

Nancy J. Whaley
Nancy J. Whaley, 13 Trustee
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303-1286

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Americredit
801 Cherry St 3900
Fort Worth, TX 76102

Georgia Department of Revenue
c/o A. Robinson
1800 Century Blvd Suite 17200
Atlanta, GA 30321

Nco Financial
Po Box 13584
Philadelphia, PA 19101

Portfolio Recovery Associates
PO Box 41067
c/o Ashley A Woerheide
Norfolk, VA 23541

End of Label Matrix
Mailable recipients 27
Bypassed recipients 0
Total 27